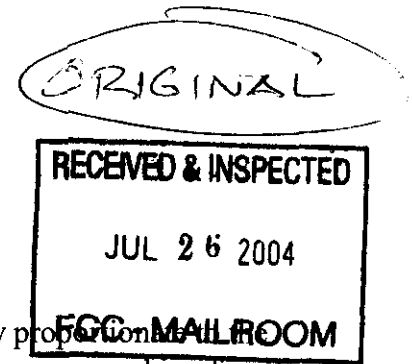


From: Mr. Colin G. Gallagher, B.S., N.R.P.I., RPCV
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RE.: RM-10803 Comment Submitted: July 21, 2004

Dear FCC & Commissioners,



The decrease in localism which we have seen over time is directly proportional to the efforts to increase media ownership. Increased ownership, and cross-ownership of media broadcasting corporations and mechanisms, is problematic in American society. It is problematic not only because it places critical broadcast decisions in the hands of fewer and fewer people (thus decreasing the level of diversity in broadcast decisions, and hampering the democratic process), but as well, because any decision to increase media ownership will ultimately result in a decrease in the ability of media in America as a whole to meet technical parameters necessary to allow expeditious increase in service (broadcast) and permitting (local and national).

On a 3-2 party-line vote in June 2003 the FCC agreed to ease most of the nation's media ownership rules. A year later the federal appeals court in Philadelphia sent the rules back to the FCC saying the panel had failed to justify the changes. Under the FCC's deregulation policies, one company would have been allowed to own three TV stations, eight radio stations and the monopoly newspaper in a single market.

Public perspectives are not well represented by corporations such as Clear Channel and General Electric, because these corporations have overriding business considerations that do not allow them to profitably engage in the process of serving the public, nor do such corporations clearly demonstrate a high level of accessibility to the public as media ownership increases. Increasing media ownership is not only occurring PROPORTIONATELY TO, but is as well the functional EQUIVALENT OF decreasing localism in broadcast media.

Working as a Planner for the County in which I reside (County of Monterey, California), I have noted that while processing permits for wireless telecommunications facilities (for FM, cellular, or other broadcast purpose) in diverse areas ranging from South County to Santa Lucia Preserve, the difficulties in ensuring that increased service is provided to the locale do not exist so much in processing and approving locally required discretionary permits (for slope, visibility, etc.) as they do in trying to ensure that accompanying ministerial permits, once approved, are actually issued. Because intermediary corporations, such as Bechtel (Bechtel being one which operates in a wide range of areas, from Monterey County to Iraq) are involved in project implementation, the process of getting construction underway is hampered by excessive inter-corporate bureaucracy. With increasing frequency, one may see a large corporation, e.g., Verizon (as an applicant), interacting with Bechtel (an intermediary), which then interacts with local consultants and contractors, who ultimately are also answerable to Verizon. Meanwhile, time spent waiting for permits to be pulled, and a project to be built, puts bandwidth at risk, because the FCC can (and will) take the allocated bandwidth away and put it back up for bid somewhere else if the project is not built within a specific time.

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Thus, the slowness and tortoise-like movement of large corporate entities (which the FCC has proposed should be allowed to own a greater share of media ownership) actually hinders the process of meeting technical parameters necessary to ensure that communities are served, increases corporate bureaucracy, and decreases potential for localism. As a specific example, a project at the highest elevation of the Santa Lucia Preserve (Pinon Peak), an excellent broadcast location, has not yet been implemented despite the permits long having been approved, due to the time it takes for the responsible corporate entities to cut checks and begin work.

Part of the solution to the problem of increasing media ownership and the tortoise-like corporate bureaucracy that comes with it (as described above) is simply to abandon the whole corporate process and operate at a local level (true localism!) to make things work where the FCC and corporations have failed. One example of how this is actually happening is in San Francisco, where Brewster Kahle and others have set up a free local system (SFLan) involving 802.11b wireless networking equipment, and utilizing an unregulated spectrum (2.4 gigahertz) for broadcast. With Brewster Kahle's free 1 Mbps wireless solution, why rely on the corporate system? You can then go to www.pirateradio.com and establish your own station easily by downloading legal and cheap broadcast software – transmit or receive for free in the 2.4 GHz area and in fact around the world – and anyone with a means of listening to an internet broadcast can hear you, using a computer or internet-compatible radio.

As such technologies increase, as corporate marketing becomes more invasive and aggressive and permeates our homes and environment, and as the FCC continues to decrease the potential of access by the public to existing broadcast mechanisms by handing more and more ownership power to corporations, you will see ordinary people taking steps to abandon a corporate-owned and corporate-run infrastructure that does not serve the public interest.

The FCC has a choice, though. It could require corporations to give a greater percentage of their broadcast time specifically to public programs. It could require that the corporations regularly open up to a local vote (at the ballot) 3 or 4 times per year, on what the programming will be and how much time would be devoted to each program. It could even require that corporations allow members of the public a regular time each and every day to physically access stations and spread their own message. The FCC could and should do some of these things, or develop similar solutions, to create a true localism – not a false parody of it. If the FCC does promptly implement the suggestions in this letter, it has a chance of giving the public a real and viable reason to be interested in media localism and infrastructure. Only when media reform occurs, and only when corporate control of media is decreased, will true potential for localism and democracy in America blossom.

Respectfully,



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